

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

2025 AUG 26 A 8:24

In re:

CHICKEN SOUP FOR THE SOUL  
ENTERTAINMENT, INC., et al.,

Debtors.<sup>1</sup>

Chapter 7

Case No.: 24-11442 (MFW)

Jointly Administered

**MOTION TO APPEAR REMOTELY**

**TO THE HONORABLE COURT:**

1. COMES NOW admitted and unobjected party in interest Charles Muszynski, pro se, (“Movant”) and requests leave to appear remotely at the 10 September 2025 Hearing set for 2:00 P.M. Eastern set to hear the “Motion To Request Entry Of Order Allowing Late Filed Proof Of Claim And To Inform”.

2. The record shows the Court conducts hearings in this matter where the vast majority of participants therein remotely appear. It is highly likely all of those appearing have significantly more financial resources and are located in closer proximity to the Court, relative to Movant’s resources and location, and include the Trustee, his counsel, and their “special counsel for *copyright litigation*”, Kerry Culpepper, in Hawaii.

<sup>1</sup>Joined with: MILLENNIUM FUNDING, INC., VOLTAGE HOLDINGS, LLC, VOLTAGE PICTURES, LLC, AMBI DISTRIBUTION CORP., AFTER PRODUCTIONS, LLC, AFTER II MOVIE, LLC, MORGAN CREEK PRODUCTIONS, INC., MILLENNIUM MEDIA, INC., COLOSSAL MOVIE PRODUCTIONS, LLC, YAR PRODUCTIONS, INC., MILLENNIUM IP, INC., KILLING LINK DISTRIBUTION, LLC, BADHOUSE STUDIOS, LLC, LHF PRODUCTIONS, INC., VENICE PI, LLC, RAMBO V PRODUCTIONS, INC., MON, LLC, SF FILM, LLC, SPEED KILLS PRODUCTIONS, INC., MILLENNIUM IP, INC., NIKOLA PRODUCTIONS, INC., WONDER ONE, LLC, BODYGUARD PRODUCTIONS, INC., OUTPOST PRODUCTIONS, INC., GLACIER FILMS 1, LLC, DEFINITION DELAWARE LLC, HANNIBAL CLASSICS INC., HANNIBAL MEDIA, INC., STATE OF THE UNION DISTRIBUTION AND COLLECTIONS, LLC, PARADOX STUDIOS, LLC, DALLAS BUYERS CLUB, LLC, and SCREEN MEDIA VENTURES, LLC, 42 VENTURES, LLC, (wholly owned by Kerry Culpepper), and declared parties in interest CULPEPPERIP, LLC, SRIPLAW, P.A., KERRY CULPEPPER, who individually appears pro se and repeatedly volunteered as a fact witness, JOEL ROTHMAN, (“Rothman”), his law firm, SRIPLaw, Inc. and PML PROCESS MANAGEMENT LIMITED, LLC of the Republic of Cyprus (the principal litigant),

d) he is awaiting resolution of his own, simple, asset-less, voluntary ch. 7 in part brought on by the same fraudulent judgment Screen Media Ventures, LLC's champerty scam attempts to collect against the foreign citizen and resident, originated by Culpepper on behalf of his fee-splitting client and parter, PML Process Management Limited, LLC (a non-lawyer), located in the Republic of Cyprus, and;

e) Culpepper and the dozens of his joined Creditors submitted themselves to Nevis' jurisdiction long before SMV and CSSE declared bankruptcy and afforded the courtesy to repeatedly remotely appear therein – despite zero basis for any foreign judgment based on statutory damages to be successfully collected as a matter of Nevis' law (much less an unargued, default judgment based on fraud where thereafter the applying lawyer committed multiple jailable offenses in an attempt to defraud Nevis' High Court), and;

f) where a preliminarily de minimus amount paid on Movant's behalf, held for his benefit by Nevis' High Court for his fees and costs of \$30,000.00 U.S. Dollars, is insignificant relative to the multi-million dollar security for fees and costs (approximately \$6.2M USD) that will further be ordered paid on Movant's behalf in the next sixty (60) days clearly establishes Movant as a Creditor of Screen Media Ventures, LLC and Chicken Soup For The Soul Entertainment, Inc., (and Culpepper's other joined "clients"), in addition to millions more in damages, qualifies Movant as a Creditor.

5. Should the Court grant the equitable consideration Movant requests to appear remotely, a proposed Order is attached for the Court's consideration and convenience.

RESPECTFULLY SUBMITTED, on 25 August 2025, Basseterre, Federation of St.

Christopher and Nevis.

(SIGNATURE PAGE FOLLOWS)

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	}	Jointly Administered
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_____	}	

[proposed] **ORDER GRANTING MOTION FOR LEAVE  
FOR MOVANT TO APPEAR REMOTELY**

Before the Court is the motion of Charles Musynski, pro se (“Movant”) seeking an Order granting leave for his remote appearance at the upcoming hearing, 10 September 2025 at 2:00 P.M.

For GOOD CAUSE, Movant’s motion is Granted. Movant may appear remotely at the Hearing set as indicated above.

In lieu of appearing personally at US Bankruptcy Court, 824 Market St., 5th Fl., Courtroom #4, Wilmington, Delaware, Movant will be provided instructions to remotely attend by the Court’s staff.

IT IS SO ORDERED. In Wilmington, Delaware, this \_\_\_\_\_ day of \_\_\_\_\_, 2025.